

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WYETH,

Plaintiff,

v.

IMPAX LABORATORIES, INC.,

Defendant.

C. A. No. 06-222 (JJF)

**REDACTED -
PUBLIC VERSION**

**DECLARATION OF KAREN JACOBS LOUDEN IN SUPPORT OF
WYETH'S OPPOSITION TO IMPAX'S MOTION TO COMPEL A
RESPONSE TO INTERROGATORY NUMBER 35**

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CONFIDENTIAL
FILED UNDER SEAL

**DECLARATION OF KAREN JACOBS LOUDEN IN SUPPORT OF
WYETH'S OPPOSITION TO IMPAX'S MOTION TO COMPEL A
RESPONSE TO INTERROGATORY NUMBER 35**

I, Karen Jacobs Loudon, am a partner with the law firm of Morris, Nichols, Arsht & Tunnell LLP. I am one of the attorneys representing Wyeth in the current litigation. I hereby declare:

1. Attached hereto as Exhibit 1 is a true and correct copy of a letter from Barbara R. Rudolph, counsel to Wyeth, to Samuel F. Ernst, counsel to Impax, dated November 17, 2006.

2. Attached hereto as Exhibit 2 is a true and correct copy of a Project Authorization Request dated June 5, 1991, bearing production numbers WYETH203-034541 through 034548.

3. Attached hereto as Exhibit 3 is a true and correct copy of internal Wyeth correspondence from Dr. R. DeNeale to Mr. R. Stewart dated April 8, 1992, bearing production number WYETH053-001602.

4. Attached hereto as Exhibit 4 is a true and correct copy of internal Wyeth correspondence from Susan Gross dated August 24, 1992, bearing production numbers WYETH020-001669 through 001677.

5. Attached hereto as Exhibit 5 is a true and correct copy of a letter from Stephen S. Hwang to Steven M. Troy dated August 6, 1992, bearing production numbers WYETH010-001701 through 001705.

6. Attached hereto as Exhibit 6 is a true and correct copy of internal Wyeth correspondence from Ms. D. Simonetti dated October 17, 1994, bearing production numbers WYETH020-002697 through 002702.

7. Attached hereto as Exhibit 7 is a true and correct copy of the Final Report for Wyeth Protocol No. 600-B-128-US, bearing production numbers WYETH010-001797 through 001884.

8. Attached hereto as Exhibit 8 is a true and correct copy of correspondence from Ms. S. Martin of Alza to Ms. S. Gross of Wyeth dated November 5, 1993, bearing production numbers WYETH020-001633 through 001636.

9. Attached hereto as Exhibit 9 is a true and correct copy of internal Wyeth correspondence from Ms. D. Simonetti dated December 12, 1994, bearing production numbers WYETH020-006027 through 006033.

10. Attached hereto as Exhibit 10 is a true and correct copy of the Final Report for Wyeth Protocol No. 600C1-152-US, bearing production numbers WYETH022-000673 through 000790.

11. Attached hereto as Exhibit 11 is a true and correct copy of internal Wyeth correspondence from Ms. D. Simonetti dated March 31, 1998, bearing production numbers WYETH020-000378 through 000379.

12. Attached hereto as Exhibit 12 is a true and correct copy of a letter from Mark L. Lee to the Vice President and General Counsel of Alza Corporation dated June 15, 1998, bearing production number WYETH203-023220.

I declare under penalty of perjury that the foregoing is true and correct.

February 21, 2007


Karen Jacobs Loudon (#2881)

EXHIBIT 1

FULLY REDACTED

EXHIBIT 2

FULLY REDACTED

EXHIBIT 3

FULLY REDACTED

EXHIBIT 4

FULLY REDACTED

EXHIBIT 5

FULLY REDACTED

EXHIBIT 6

FULLY REDACTED

EXHIBIT 7

FULLY REDACTED

EXHIBIT 8

FULLY REDACTED

EXHIBIT 9

FULLY REDACTED

EXHIBIT 10

FULLY REDACTED

EXHIBIT 11

FULLY REDACTED

EXHIBIT 12

FULLY REDACTED

CERTIFICATE OF SERVICE

I, Karen Jacobs Louden, hereby certify that on February 21, 2007, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Mary B. Matterer
MORRIS, JAMES, HITCHENS & WILLIAMS, LLP


I also certify that copies were caused to be served on February 21, 2007 upon the following in the manner indicated:

BY HAND

Mary B. Matterer
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BY FEDERAL EXPRESS

M. Patricia Thayer
John M. Benassi
Jessica R. Wolf
Heller Ehrman LLP
4350 La Jolla Village Drive
San Diego, CA 92102

/s/ 
klouden@mnat.com

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BY FEDERAL EXPRESS (on 3/1/07)

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